



COMPLIANCE UPDATE

By Kim Slote, policy analyst

ADDITIONAL COVID-19 GUIDANCE

Three electronic announcements were published in July addressing Coronavirus guidance. As the new academic year approaches, it is important to keep up to date on current guidance. Links to those announcements are below with the date of publication.

[Reminder of Alternative Acceptable Documentation to Complete for IRS Verification of Non-Filing and Form W-2; Increase in Professional Judgments due to COVID-19 – July 9, 2020](#)

The USDE published a reminder regarding alternative acceptable documentation. One of the topics covered how independent students and parents should provide Verification of Non-Filing. Dependent students are not required to prove a non-filing status. Special consideration should be given to foster youth and unaccompanied homeless youth as they have an extremely difficult time accessing appropriate documentation. Appropriate documentation is outlined in the announcement for those situations.

Professional Judgment is also covered. There is high unemployment nationwide. A student's or their family's financial situation may have changed, since the student's FAFSA was filed. Schools are encouraged to use PJ to reflect their financial need accurately. Financial Aid Administrators may be reluctant to increase the use of PJ, since the percentage of PJs is part of the selection criteria for a program compliance review. The USDE assures schools it will adjust their risk-based model and will not negatively view the increased use of PJs.

[Additional regulatory flexibilities related to Coronavirus \(COVID-19\) – July 10, 2020](#)

Because of the continuing challenges related to COVID-19, the USDE has issued additional regulatory flexibilities. The date for schools to distribute their Annual Security Reports and Annual Fire Safety Reports to required recipients has been extended to Dec. 31, 2020. The same date applies for distribution of a school's annual Equity in Athletics Disclosure Act disclosures to required recipients. The deadline to submit the Fiscal Operations Report and Application to Participate has been extended to Nov. 2, 2020. Survey information is provided in the announcement.

[Update on Required CARES Act Quarterly Reporting – July 10, 2020](#)

This announcement outlines quarterly reporting requirements for grantees that received more than \$150,000 from the Coronavirus Aid, Relief and Economic Security Act. The USDE determined that the quarterly reporting requirements are satisfied through existing federal reporting mechanisms. Information provided explains how those requirements are met for the following programs under the CARES ACT.

- Higher Education Emergency Relief Fund
- Governor's Emergency Education Relief Fund
- Elementary and Secondary School Emergency Relief Fund
- Gallaudet University Grant
- Howard University Grant
- Education Stabilization Fund – Reimagine Workforce Preparation Discretionary Grant
- Education Stabilization Fund – Rethink K-12 Education Models Discretionary Grant
- Project School Emergency Response to Violence
- Education Stabilization Fund Program Outlying Areas-State Educational Agency
- Education Stabilization Fund Program Outlying Areas-Governors

Additional information and resources regarding COVID-19 are available at the following link.

<https://www.ed.gov/coronavirus?src=feature>